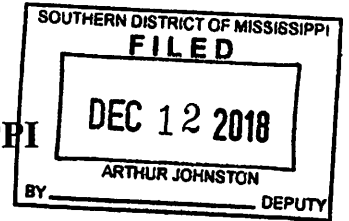


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, & ASHOKA

**RESPONSE IN OPPOSITION TO MOTION
SEEKING ADDITIONAL DISCOVERY (ECF# 300)**

Plaintiff Douglas Handshoe respectfully submits this response in opposition to Defendant Charles Leary's Motion Seeking Additional Discovery (ECF# 300) and he will show that Mr. Leary's Motion should be denied.

Mr. Leary's Motion should be denied because he has had ample opportunity to previously seek the overly broad discovery he now asks this Court to grant at this late stage of the litigation, including deposing the Plaintiff. By his own conduct Leary has substantially delayed the resolution of this case and he does not approach this Court in good faith.

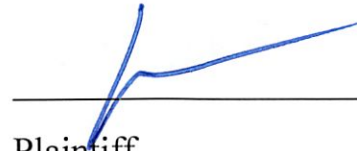
Attached to this Response in Opposition as Exhibit 1 is an email chain which brings additional clarity to Leary's claim that "Handshoe previously refused to

cooperate in scheduling his deposition”. As the email chain illustrates, Leary’s first request that Plaintiff “consent to be deposed if I decide to file a motion seeking your reciprocal deposition” was made by Leary on July 3, 2018, months after the close of discovery. Notably, while Mr. Leary has repeatedly claimed that Plaintiff’s previous responses to Leary’s Interrogatories, Requests for Admission and Production were evasive or non-responsive, Leary never filed a Motion to Compel or otherwise attempted to properly bring that issue to the Court’s attention in the nine plus months that have since elapsed.

Attached as Exhibit 2 is the transcript of the deposition of Charles Leary taken July 27, 2018. As the Court will note that deposition was interrupted on multiple occasions by Vaughn Perret, who attempted to pass himself off as Leary’s lawyer despite the fact Perret is neither licensed to practice law in Mississippi or enrolled in this instant matter.

These matters are more fully discussed in the accompanying Memorandum that is contemporaneously filed with this Opposition.

Respectfully submitted this 12th day of December,
2018,

A handwritten signature in blue ink, appearing to be 'Douglas Handshoe', is written over a horizontal line.

Plaintiff
Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on December 12, 2018 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on December 12, 2018, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada.

Respectfully submitted this 12th day of December, 2018,



Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com